U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Orange County Metal Processing - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #4**
Progress
Orange County Metal Processing
A955
Fullerton, CA

To: Harry Allen, EPA Region 9
Daniel Meer, EPA Region 9

From: Craig Benson, On-Scene Coordinator
Date: 7/14/2014
Reporting Period: 6/30/14 - 7/11/14

1. Introduction

1.1 Background

Site Number:	A955	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/29/2014
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2014	**Start Date:**	6/3/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:	A955	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical PRP Removal Action

1.1.2 Site Description

Orange County Metal Processing (OCMP) is an abandoned metal zinc plating and anodizing business that processed parts for the automobile and computer industries. The company conducted business from approximately 1980 until 2011 at one parcel in a light industrial area of Fullerton, Orange County, California. Previous metal plating operations are believed to have been conducted at the site beginning in the 1960s.

The primary constituents of concern at OCMP include sludge's and solutions bearing cyanide, chromium, copper and zinc, and acidic and caustic compounds. The Orange County Health Care Agency (OCHCA) requested EPA's assistance with the Site on March 12, 2014.

1.1.2.1 Location

OCMP is located in a mixed commercial and industrial area at 1711 E. Kimberly Avenue, Fullerton, California in the east portion of the city of Fullerton (Latitude: 33.8638° Longitude: -117.8961°) The Site is located on the western portion (approximately 0.3 acres) of Assessor's Parcel Number (APN) 033-270-30. The larger central and eastern portion of the parcel housed the former PCA Metal Finishing, Inc. business with an address of 1726 East Rosslyn Avenue.

A stormwater channel, railroad track, Kimberly Avenue, and commercial and industrial businesses are located to the south of the Site. Rosslyn Avenue and commercial/industrial businesses are located north of the Site. The Santa Ana River, the primary surface water drainage feature in the area, is located approximately 2.5 miles east and southeast of the site.

1.1.2.2 Description of Threat

See POLREP #1

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

See POLREPS 1 thru 3 for activities occurring 6/3/14 thru 6/29/14.

Week of 6/30/14 – 7/4/14

- 6/30/14: Three waste streams transferred off-site under manifest (see 2.1.4 Progress Metrics): 32,500 pounds of cyanide solids, 70 cubic yards of metals contaminated solids and debris, and 275 gallons of oxidizing/corrosive liquid.
- On 7/1/14, the PRP formally requested a 30 day extension of time to complete the removal action per the terms of UAO paragraph 58. OSC Benson granted the extension on 7/2/14. Two waste streams transferred off-site under manifest (see 2.1.4 Progress Metrics): 1,000 pounds of cyanide solids and 70 cubic yards of metals contaminated solids and debris.
- Removal of vats and WWT system tanks/containers and consolidation of remaining liquid and solid wastes was completed by 7/2/14. Several consolidated waste streams remain staged pending off-site transfer.
- 7/3/14 – 7/7/14: Temporary project demobilization for the holiday weekend.

Week of 7/7/14 – 7/11/14

- The PRP contractor team focused on removal of the debris (including vat support cinderblocks) and residue in the now exposed north and south secondary containment pits. Samples were collected for profile analysis of separately stockpiled cinderblocks/concrete and solid pit debris removed from the area of the former cyanide vats. General residue and debris is being placed in staged roll-off-bins under an existing RCRA profile.
- PRP submitted a Workplan Addendum to address the characterization of concrete and shallow soil underlying the pits. EPA is presently evaluating this addendum.
- OSC Benson has organized a brief on-site meeting with PRP contractor, DTSC and Orange County Environmental Health personnel for 7/15/14 to discuss project activities to date and the upcoming concrete and shallow pit soil sampling effort. Any soils excavation that may result from this effort is expected to be minimal and only address concrete and soils that present or may easily present a direct contact hazard. The meeting will address the removal data use objectives and provide awareness to the stakeholder agencies with follow-up site responsibilities (i.e., on-going DTSC subsurface remediation program, property transfer, etc.).
- The PRP contractor team continues to work on profile acceptance and draft manifests for several liquid and solid hazardous waste streams remaining on-site, including lab pack drums, liquid totes, bulk waste drums, and roll-off-bins. Several manifested loads are expected to be transferred off-site next week.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Three PRPs received CERCLA General Notice Letters and a CERCLA UAO. The property ownership trust has been a responsive PRP and is currently complying with the terms of the UAO. All phases of the removal will be approved and overseen by EPA.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Facility*	*Date*
Hazardous Waste Liquid, N.O.S. (D007, D005)	Liquids	4,600 gals.	013102317JJK	Evoqua	6/16/14
Hazardous Waste Liquid, N.O.S. (D007, D005)	Liquids	1,250 gals.	013102316JJK	Evoqua	6/17/14
Waste Cyanide Solutions, N.O.S. (D007, F007)	Liquids	1,500 gals.	013102450JJK	US Ecology	6/25/14
Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. (D002, D007, D005)	Liquids	1,925 gals.	013102446JJK	US Ecology	6/25/14
Hazardous Waste Solid, N.O.S. (D003, D005, D007, F008)	Solids	32,500 lbs.	013265318JJK	US Ecology	6/30/14
Waste Oxidizing Liquid, Corrosive, N.O.S. (D001, D002, D007, D010, D011)	Liquids	275 gals.	013265310JJK	Evoqua	6/30/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	70 cubic yards	013265324JJK	US Ecology	6/30/14
Hazardous Waste Solid, N.O.S. (D003, D005, D007, F008)	Solids	1,000 lbs.	013265352JJK	US Ecology	7/1/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	70 cubic yards	013265321JJK	US Ecology	7/1/14

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

Numerous limited subsurface environmental investigations have been conducted at OCMP and adjoining former PCA property since 1990. In 2007, DTSC conducted a Phase I Environmental Assessment Verification of the OCMP property. Results of this Phase 1 Verification suggested that volatile organic compounds (VOCs) tetrachloroethylene (PCE) and trichloroethylene (TCE) were potential constituents of concern in soil gas and in groundwater at/around the property. DTSC began using State Orphan Funds (Hazardous Substances Cleanup Account) to further investigate and eventually begin subsurface remediation at the Site.

A soil, soil vapor, and groundwater investigation was conducted by DTSC's Brownfield and Environmental Restoration Program (Cleanup Program) in 2012 to identify the areas where VOCs were present in the subsurface and to get a general understanding of groundwater contamination levels Soil gas and groundwater sample results confirmed that PCE and TCE are the primary VOCs present however, a source area for the VOCs was not identified and the lateral and vertical extent of VOCs was not delineated based on the data obtained. Concentrations of metals in groundwater and soil samples were within the background ranges and did not indicate metal impacts to soil or groundwater from site operations.

DTSC's effort ultimately resulted in the installation of a Soil Vapor Extraction (SVE) system that encompasses both the former PCA facility and OCMP property. The SVE system has been operated intermittently by DTSC since May 2012. In the meantime, DTSC has conducted additional investigation at the PCA facility and has also brought on additional extraction wells to feed into the SVE system. The aboveground components of the SVE system involve a trailer mounted high vacuum blower staged near the south anodizing line and piping runs from extraction wells to a knockout tank and dual 2000 pound vapor phase granular activated carbon vessels connected in series in proximity to the wastewater treatment system.

According to the DTSC Cleanup Program Project Managers, from this point forward, PCA and OCMP will be considered as one large site for subsurface cleanup purposes due to the location of the plume. Currently, there is a groundwater pilot test being evaluated by DTSC to assess the feasibility of implementing a groundwater remedy at the site. There are already plans to expand the SVE system to accommodate areas where the radius of influence for extraction is not reachable.

The DTSC sponsored subsurface investigation and remediation effort is an area wide effort and is not necessarily related to past or on-going practices at the OCMP. It is summarized here as the above ground features of the SVE system and the numerous groundwater monitoring, soil vapor and soil boring installations are key characteristics of the site today. In addition, the DTSC ISE and use of State Orphan Funds is intended only for subsurface remediation issues.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.